

RECEIVED

MAR 29 2021

Q 38279

#2

131

119743

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
FIRST MUNICIPAL DISTRICT

Jennifer A. Prusinski Plaintiff v. William J. Garrett & Lubenow Express, LLC Defendants)) No.)) Amount Claimed:\$ 25,558.42)) Return Date:))))))
--	---

COMPLAINT - TORT

1. On or about April 14, 2020, and at all times material herein, Plaintiff, Jennifer A. Prusinski was the owner of a 2020 Chevrolet, which was then and there being operated upon East Avenue, a public highway located in the City of La Grange, and State of Illinois.

2. That Defendant William J. Garrett at the same time and place, owned, operated and/or controlled a certain motor vehicle along and upon East Avenue in the city and state aforesaid, and that at said time and place there was a collision between the vehicles driven by the Plaintiff and the Defendant William J. Garrett.

3. At the time of the above-stated accident, the Defendant William J. Garrett was acting as an agent or employee of the Defendant Lubenow Express, LLC.

4. It was then and there the duty of the Defendants to obey the statutes of the State of Illinois and to exercise reasonable care in the operation of said vehicle as to avoid injury to Plaintiff.

5. That notwithstanding the duty aforesaid, Defendants, individually or by a duly authorized agent in that behalf, were guilty one or more of the following acts or omissions:

- (a) Negligently failed to maintain a proper lookout;
- (b) Negligently operated said vehicle at speed greater than prevailing condition permitted;
- (c) Negligently failed to yield the right of way;
- (d) Negligently disregarded traffic signals;
- (e) Negligently failed to keep said vehicle under proper control;
- (f) Negligently failed to stop said vehicle when danger to Plaintiff(s) was imminent.

6. That as a direct and proximate result one or more of the foregoing acts or omissions, and as a consequence thereof, Plaintiff's vehicle was greatly damaged and Plaintiff was required to repair or replace the same and was deprived of the use thereof.

Wherefore, Plaintiff Jennifer A. Prusinski asks judgment against the Defendants William J. Garrett and Lubenow Express, LLC in the amount of \$25,558.42 and costs.

/s/ Kevin Keeley
/s/ Brad Krapfl
Kevin Keeley 6303670
Brad Krapfl 6286636
Attorneys for Plaintiff

Attorney Code: 44580
Keis George LLP
One North LaSalle St., Suite 2046
Chicago, Illinois 60602
Ph: (312) 606-4100
Fax: (312) 606-4102
Email: docket@keisgeorge.com